

**FILED**

6/5/2025

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN THE MATTER OF THE  
GOVERNMENT'S OMNIBUS MOTION  
TO WITHDRAW FORMER COUNSEL

Nos. [Identified in Exhibit A]  
Hon. Virginia M. Kendall  
Chief Judge

**GOVERNMENT'S OMNIBUS MOTION TO  
WITHDRAW FORMER COUNSEL**

Now comes the UNITED STATES OF AMERICA, by ANDREW S. BOUTROS, United States Attorney for the Northern District of Illinois, and states as follows in support of its Omnibus Motion to Withdraw Former Counsel, and respectfully states as follows:

1. The individuals identified in Exhibit A ("List of Former Government Counsel and Related Matters") to this motion previously served as Assistant United States Attorneys or as the United States Attorney with the U.S. Attorney's Office for the Northern District of Illinois but are no longer employed by or otherwise associated with the U.S. Attorney's Office (the "Former Government Counsel").
2. The Former Government Counsel have appearances on file on behalf of the United States in the matters identified in Exhibit A.
3. Because the Former Government Counsel are no longer employed by or associated with the United States Attorney's Office, they may no longer appear as counsel on behalf of the United States in the matters identified in Exhibit A.

For the reasons stated herein, the government hereby moves this Court to grant it leave to withdraw the Former Government Counsel from the matters identified in Exhibit A.

Respectfully submitted,

ANDREW S. BOUTROS  
United States Attorney

By: /s/Christopher K. Veatch  
CHRISTOPHER K. VEATCH  
Assistant United States Attorney  
219 S. Dearborn Street, Rm. 500  
Chicago, Illinois 60604  
(312) 886-3389

**Exhibit A****List of Former Government Counsel and Related Matters**

<b>Former Government Counsel</b>	<b>Case Number</b>	<b>Case Name</b>
Amarjeet Bhachu	1:04-cr-00225	
Amarjeet Bhachu	1:05-cr-00471	
Amarjeet Bhachu	1:05-cr-00472	
Amarjeet Bhachu	1:05-cr-00472	
	1:09-cr-00727	
Amarjeet Bhachu	*SEALED*	
Amarjeet Bhachu	1:09-cr-00969	
Amarjeet Bhachu	1:11-cr-00150	
Amarjeet Bhachu	1:13-cr-00515	
Amarjeet Bhachu	1:17-cr-00522	
	1:18-cr-00313	
Amarjeet Bhachu	*SEALED*	
	1:18-cr-00313	
Amarjeet Bhachu	*SEALED*	
Amarjeet Bhachu	1:20-cr-00602	
Amarjeet Bhachu	1:20-cr-00812	
Amarjeet Bhachu	1:22-cr-00115	
Amarjeet Bhachu	1:22-cr-00115	
Amarjeet Bhachu	1:22-cr-00213	
Amarjeet Bhachu	1:22-cr-00520	
Amarjeet Bhachu	1:23-cr-00283	
Amarjeet Bhachu	1:23-cr-00283	
Amarjeet Bhachu	1:24-cr-00153	
Charles Mulaney	1:00-cr-00649	
Charles Mulaney	1:02-cr-00573	
Charles Mulaney	1:04-cr-01001	
Charles Mulaney	1:10-cr-00802	
Charles Mulaney	1:18-cr-00460	
Charles Mulaney	1:18-cr-00743	
Charles Mulaney	1:18-cr-00743	
Charles Mulaney	1:18-cr-00818	

Charles Mulaney	1:18-cr-00818	
Charles Mulaney	1:19-cr-00936	
Charles Mulaney	1:20-cr-00422	
Charles Mulaney	1:20-cr-00422	
Charles Mulaney	1:20-cr-00513	
Charles Mulaney	1:20-cr-00577	
Charles Mulaney	1:20-cr-00577	
Charles Mulaney	1:20-cr-00577	
Charles Mulaney	1:20-cr-00800	
Charles Mulaney	1:21-cr-00253	
Charles Mulaney	1:21-cr-00497	
Charles Mulaney	1:21-cr-00603	
Charles Mulaney	1:21-cr-00603	
Charles Mulaney	1:21-cr-00603	
Charles Mulaney	1:21-cr-00605	
Charles Mulaney	1:21-cr-00608	
Charles Mulaney	1:22-cr-00174	
Charles Mulaney	1:22-cr-00451	
Charles Mulaney	1:22-cr-00591	
Charles Mulaney	1:22-cr-00593	
Charles Mulaney	1:22-cr-00664	
Charles Mulaney	1:23-cr-00113	
Charles Mulaney	1:23-cr-00209	
Charles Mulaney	1:23-cr-00237	
Charles Mulaney	1:23-cr-00338	
Charles Mulaney	1:23-cr-00339	
Charles Mulaney	1:23-cr-00412	
Charles Mulaney	1:23-cr-00643	
Charles Mulaney	1:24-cr-00420	
David Green	1:20-cr-00288	
David Green	1:22-cr-00251	

David Green	1:22-cr-00263
Elizabeth Pozolo	1:14-cr-00543
	1:20-cr-00139
Elizabeth Pozolo	*SEALED*
Elizabeth Pozolo	1:22-cv-01727
Elizabeth Pozolo	1:23-cr-00377
Elizabeth Pozolo	1:23-cr-00455
Georgia Alexakis	1:08-cr-00746
Georgia Alexakis	1:08-cr-00746
Georgia Alexakis	1:09-cr-00383
Georgia Alexakis	1:14-cr-00705
Georgia Alexakis	1:14-cr-00705
Georgia Alexakis	1:14-cr-00705
Georgia Alexakis	1:15-cr-00615
Georgia Alexakis	1:15-cr-00617
Georgia Alexakis	*SEALED*
Georgia Alexakis	1:15-cr-00618
Georgia Alexakis	1:15-cr-00619
Georgia Alexakis	*SEALED*
Georgia Alexakis	1:15-cr-00619
Georgia Alexakis	*SEALED*
Georgia Alexakis	1:15-cr-00619
Georgia Alexakis	*SEALED*
Georgia Alexakis	1:15-cr-00619
Georgia Alexakis	*SEALED*
Georgia Alexakis	1:15-cr-00619
Georgia Alexakis	*SEALED*

Georgia Alexakis	1:15-cr-00619 *SEALED*	
Georgia Alexakis	1:16-cr-00394	
Georgia Alexakis	1:18-cr-00185	
Jeannice Appenteng	1:03-cr-01136	
Jeannice Appenteng	1:03-cr-01136	
Jeannice Appenteng	1:16-cr-00304	
Jeannice Appenteng	1:23-cr-00352	
Jeremy Daniel	1:07-cr-00722	
Jeremy Daniel	1:12-cr-00356	
Jeremy Daniel	1:18-cr-00517	
Jeremy Daniel	1:18-cr-00517	
Jeremy Daniel	1:19-cr-00052	
Jeremy Daniel	1:19-cr-00052	
Jeremy Daniel	1:19-cr-00226	
Jeremy Daniel	1:19-cr-00753	
Jeremy Daniel	1:22-cr-00611	
Jeremy Daniel	1:97-cr-00642	
John Lausch	1:00-cr-00068	
John Lausch	1:00-cr-00176	
John Lausch	1:00-cr-00993	
John Lausch	1:01-cr-00494	
John Lausch	1:01-cr-00494	
John Lausch	1:01-cr-00494	
John Lausch	1:02-cr-00298	
Lela Johnson	1:02-cr-00210	
Lela Johnson	1:02-cr-01192	
Lela Johnson	1:04-cr-00646	
Lela Johnson	1:09-cr-00911	
Maureen McCurry	1:18-cr-00728	

Maureen McCurry	1:18-cr-00728
Maureen McCurry	1:18-cr-00728
Maureen McCurry	1:19-cr-00641
Maureen McCurry	1:19-cr-00641
Maureen McCurry	1:19-cr-00641
	1:20-cr-00303
Maureen McCurry	*SEALED*
Maureen McCurry	1:20-cr-00675
Maureen McCurry	1:21-cr-00392
Maureen McCurry	1:21-cr-00392
Maureen McCurry	1:21-cr-00643
Maureen McCurry	1:22-cr-00097
Maureen McCurry	1:22-cr-00651
Maureen McCurry	1:22-cr-00651
Maureen McCurry	1:23-cr-00083
Maureen McCurry	1:23-cr-00083
Maureen McCurry	1:23-cr-00083
Maureen McCurry	1:23-cr-00175
Maureen McCurry	1:23-cr-00377
Maureen McCurry	1:23-cr-00580
Maureen McCurry	1:23-cr-00580
Maureen McCurry	1:23-cr-00580
	1:23-cr-00581
Maureen McCurry	*SEALED*
Maureen McCurry	1:23-cv-00330
Maureen McCurry	1:24-cr-00081
Maureen McCurry	1:24-cr-00081
Maureen McCurry	1:24-cr-00172
Maureen McCurry	1:24-cr-00323
Maureen McCurry	1:24-cr-00471
Michael Beckman	3:21-cr-50034
	3:21-cr-50046
Michael Beckman	*SEALED*
Michael Beckman	3:22-cr-50026
Michael Beckman	3:22-cr-50055
Michael Beckman	3:23-cr-50020
Michael Beckman	3:23-cr-50020
Misty Wright	1:16-cr-00307

Misty Wright	1:16-cr-00394	
Misty Wright	1:17-cr-00531	
Misty Wright	1:18-cr-00681	
	1:18-cr-00693	
Misty Wright	*SEALED*	
Misty Wright	1:20-cr-00437	
Misty Wright	1:21-cr-00221	
Misty Wright	1:21-cr-00419	
Misty Wright	1:22-cr-00065	
Misty Wright	1:22-cv-04979	
Misty Wright	1:23-cr-00140	
Misty Wright	1:23-cr-00142	
Misty Wright	1:23-cr-00410	
Misty Wright	1:23-cr-00649	
Misty Wright	1:24-cr-00243	
Misty Wright	1:24-cr-00265	
Misty Wright	1:24-cr-00337	
Patrick King	1:03-cr-00090	
Patrick King	1:03-cr-00444	
Patrick King	1:04-cr-00200	
Patrick King	1:08-cr-00196	
Patrick King	1:08-cr-00196	
Patrick King	1:09-cr-01040	
Patrick King	1:10-cr-00874	
Patrick King	1:11-cr-00751	
Patrick King	1:19-cr-00582	
Patrick King	1:20-cv-02870	
Patrick King	1:22-cr-00394	
Patrick King	1:22-cv-01684	
Patrick King	1:92-cr-00208	
Patrick King	1:92-cr-00632	
Patrick King	1:96-cr-00291	
Patrick King	1:96-cr-00291	
Patrick King	1:96-cr-00291	
Peter Flanagan	1:11-cr-00691	
Peter Flanagan	1:12-cr-00356	
Peter Flanagan	1:12-cr-00923	
Peter Flanagan	1:12-cr-00924	
Peter Flanagan	1:13-cr-00906	
Peter Flanagan	1:14-cr-00539	

Peter Flanagan	1:14-cr-00539
Peter Flanagan	1:15-cr-00062
Peter Flanagan	1:15-cr-00063
Peter Flanagan	1:15-cr-00064
Peter Flanagan	1:16-cr-00462
	1:18-cr-00745
Peter Flanagan	*SEALED*
Peter Flanagan	1:19-cv-08139
Peter Flanagan	1:21-cr-00277
Peter Flanagan	1:21-cr-00486
Peter Flanagan	1:21-cr-00486
	1:25-cr-00027
Peter Flanagan	*SEALED*
Philip Fluhr	1:16-cr-00668
Philip Fluhr	1:21-cr-00188
Philip Fluhr	1:21-cr-00486
Philip Fluhr	1:21-cr-00486
Philip Fluhr	1:22-cr-00110
Philip Fluhr	1:22-cr-00110
Philip Fluhr	1:22-cr-00275
Philip Fluhr	1:22-cv-07310

Philip Fluhr	3:15-cr-50011
Scott Paccagnini	3:04-cr-50071
Scott Paccagnini	3:04-cr-50071
Scott Paccagnini	3:13-cr-50051
Scott Paccagnini	3:17-cr-50018 *SEALED*
Scott Paccagnini	3:18-cv-70002
Scott Paccagnini	3:19-cr-50029
Scott Paccagnini	3:21-cr-50023
Talia Bucci	3:04-cr-50054
Talia Bucci	3:14-cr-50007
Talia Bucci	3:14-cr-50042
Talia Bucci	3:16-cr-50030
Talia Bucci	3:22-cr-50061
Talia Bucci	3:23-cr-50005
Talia Bucci	3:23-cr-50008
Talia Bucci	3:23-cr-50018
Yusef Dale	1:03-cr-00090
Yusef Dale	1:04-cr-00459
Yusef Dale	1:04-cr-01072
Yusef Dale	1:09-cr-00383
Yusef Dale	1:13-cr-00632
Yusef Dale	1:15-cr-00583
Yusef Dale	1:21-cr-00188
Yusef Dale	1:21-cr-00761
Yusef Dale	1:22-cr-00394
Yusef Dale	1:22-cr-00593
Yusef Dale	1:24-cr-00379